

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SANOFI-AVENTIS SECURITIES	:	Civil Action No. 1:07-cv-10279-GBD
LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	
	:	
ALL ACTIONS.	:	
	:	
	X	

RULE 26(F) REPORT

Pursuant to the Federal Rule of Civil Procedure 26(f), counsel for the parties to this action have conferred and jointly submit the following report outlining a proposed discovery plan.

I. Federal Rule of Civil Procedure 26 Disclosures

The parties shall exchange their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before May 20, 2011.

II. Stipulation and Order Governing Confidential Material

All discovery will be subject to a Stipulated Confidentiality Order that the parties are currently negotiating and intend to file with the Court shortly.

III. Electronically Stored Information (ESI)

The parties have commenced discussions regarding electronic discovery, will continue to discuss the issues set forth in Rule 26(f), and related issues, as discovery proceeds and will endeavor to work together to resolve any such issues that may arise.

IV. Changes to Discovery Limitations

Pursuant to Fed. R. Civ. P. 26(f)(3)(E), the parties have considered what, if any, changes or limitations should be imposed on the discovery permitted by the Federal Rules of Civil Procedure and/or Local Rules. The parties believe it is premature to define further adjustments at this time, but agree to confer in good faith after document discovery has commenced regarding, *inter alia*, any expansion of the limitations on depositions and interrogatories set forth in the Federal Rules of Civil Procedure and/or Local Rules.

V. Service By E-Mail

In addition to filing on the Court's ECF filing system, the parties agree to effectuate all service by e-mail, subject to the following: promptly following e-mail service of discovery requests, at least one hard copy of the discovery requests shall be sent via U.S. Mail to opposing counsel.

VI. Proposed Pretrial Schedule

The parties jointly submit the following proposed pretrial schedule. It is contemplated that the parties will meet and confer with respect to any issues that may arise in the discovery process. Each party reserves its rights to seek adjustment, or oppose adjustment, of the deadlines set by this scheduling order.

May 20, 2011	Service of Rule 26(a)(1) initial disclosures and answer.
September 2, 2011	Deadline for filing of plaintiffs' Motion for Class Certification, to be followed by any further discovery regarding class certification issues and then briefing of the motion on a schedule to be agreed by counsel.
August 31, 2012	Close of fact discovery, including depositions of party and non-party witnesses.
October 19, 2012	Plaintiffs' expert reports due.
December 3, 2012	Defendants' expert reports due.
January 25, 2013	Plaintiffs' rebuttal expert reports due.
March 8, 2013	Close of expert discovery.
April 26, 2013	Last day to file dispositive motions with the Court.
June 7, 2013	Opposition to dispositive motion due.
July 12, 2013	Reply to dispositive motion due.

VII. Modifications to Procedures and/or Deadlines

The discovery procedures and deadlines contained herein may be modified either through the agreement of the parties (confirmed by notice of the agreement filed with the Court) or upon motion to the Court based upon a showing of good cause.

DATED: April 20, 2011

Respectfully submitted,

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TRIG R. SMITH
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s/ TRIG R. SMITH

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DATED: April 20, 2011

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 20, 2011.

s/ TRIG R. SMITH
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Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)